

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

UNITED STATES OF AMERICA	)	CRIMINAL NO. <u>3:07-929</u>
	)	18 U.S.C. § 1349
	)	18 U.S.C. § 1956(h)
v.	)	18 U.S.C. § 981(a)(1)(C)
	)	18 U.S.C. § 982(a)(1)
	)	28 U.S.C. § 2461(c)
CHARLENE CORLEY;	)	
C&D DISTRIBUTORS, LLC	)	<b><u>INFORMATION</u></b>

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

1. At all times relevant to this Information:

a. Defendant C&D DISTRIBUTORS, LLC, was a South Carolina partnership and/or Limited Liability Company. Defendant C&D DISTRIBUTORS, LLC, was a registered government contractor with the Department of Defense which supplied hardware components, plumbing fixtures, electronic equipment and various other items to various military installations worldwide. The office of Defendant C&D DISTRIBUTORS, LLC, was located at 1773 Augusta Highway, Lexington, South Carolina.

b. Defendant CHARLENE CORLEY was a member and 50% owner of C&D DISTRIBUTORS, LLC. Defendant CHARLENE CORLEY was the listed organizer of this company and the listed agent for service of process. Defendant CHARLENE CORLEY was the designated point of contact for Defendant C&D

DISTRIBUTORS, LLC, for the Department of Defense and an active participant in the business of C&D DISTRIBUTORS, LLC.

c. An unindicted co-conspirator (hereinafter identified as "Person A") was a member and 50% owner of C&D DISTRIBUTORS, LLC. Person A died on October 2, 2006 in Lexington, South Carolina.

d. Defendant C&D DISTRIBUTORS, LLC, competed for government contracts on-line through various internet bid board systems, including one known as DIBBS (Defense Logistics Agency -- Business System Modernization Internet Bid Board System). DIBBS is a web-based application that provides the capability to search for, view, and submit quotes on items needed by the Government. Other internet board systems were also utilized, including the Procurement Gateway and the Internet Quoting System.

e. As part of the registration process, all government contractors were required to register with the Central Contractor Registration in order to be awarded contracts by the federal government.

f. The Defense Supply Center Philadelphia ("DSCP"), is a division of the Department of Defense, which supplies and manages over \$12.7 billion worth of food, clothing, textiles, pharmaceuticals, medical supplies, general supplies, and industrial items to support military forces stationed throughout the world.

g. Defense Finance & Accounting Service ("DFAS") is the payment service center of the Department of Defense based in Columbus, Ohio. Invoices

submitted by government contractors for shipping costs were paid electronically by DFAS. There was no reconciliation performed by DFAS between item costs and transportation costs. The reconciliation mechanism was removed by DFAS in order to expedite shipment of needed items overseas in support of military forces. These transportation charges were received by DFAS on electronic invoices and paid automatically through the Standard Automated Material Management System ("SAMMS") without edits and human review. SAMMS is the electronic system used to process payments to Department of Defense Contractors.

h. By the terms of the contracts awarded to the Defendants C&D DISTRIBUTORS, LLC, and CHARLENE CORLEY, transportation costs were not allowed to be billed separately to the government or were only allowed up to the actual cost of shipping the items.

#### SCHEME AND ARTIFICE TO DEFRAUD

2. During a period beginning in or about November 1997, and continuing until the date of this Information, in the District of South Carolina and elsewhere, CHARLENE CORLEY and C&D DISTRIBUTORS, LLC, Defendants herein, and Person A, devised and intended to devise a scheme and artifice to defraud and to obtain money by means of materially false and fraudulent pretenses, representations, promises, and material omissions.

3. It was a part of the scheme that Defendants CHARLENE CORLEY and C&D DISTRIBUTORS, LLC, and Person A, submitted on-line bids for government

contracts to supply items to the Department of Defense. After a successful bid for the government contract, a subsequent invoice was submitted by C&D DISTRIBUTORS, LLC, to the government for fraudulent shipping costs. In this manner, Defendants CHARLENE CORLEY and C&D DISTRIBUTORS, LLC submitted approximately 499 false invoices representing shipping claims in excess of approximately \$71,611,296.12 to the Defense Logistics Agency. Defendants CHARLENE CORLEY and C&D DISTRIBUTORS, LLC, and Person A were paid on one hundred twelve (112) of these invoices in the amount of approximately \$20,576,925.00 for fraudulent shipping charges, examples of which are detailed below:

Contract Number	Inv Date	Item Description (Number of Units)	Total Cost of Items	Transportation Invoice Amount	Status
SP070004MR0490001	11/7/2003	pump unit, centrifug (11)	\$924.00	\$41,076.00	NOT PAID
SP070004MR049	11/11/2003	pump unit, centrifug (11)	\$924.00	\$41,923.00	PAID
SP041403MAD630000	3/26/2004	longitudinal girder (19)	\$75.81	\$402,074.81	NOT PAID
SPM76004P08520001	4/2/2004	valve, solenoid (1)	\$89.90	\$40,300.90	NOT PAID
SPM76004P0852	4/7/2004	valve, solenoid (3)	\$269.67	\$402,380.67	NOT PAID
SPM76003P8429	4/22/2004	tubing, nonmetallic (5)	\$29.95	\$402,147.95	NOT PAID
SP070004MR209	4/29/2004	elbow, pipe to tube (1)	\$8.75	\$445,640.75	PAID
SPE76004P0577	5/6/2004	valve, check (1)	\$51.99	\$40,289.99	NOT PAID
SP041104WE358	7/23/2004	plug, machine thread (1)	\$10.99	\$492,096.99	PAID
SP074004MKM63	10/20/2004	diaphragm (5)	\$109.95	\$159,000.95	PAID

SP056004MDN22	4/5/2005	lamp, fluorescent (1)	\$112.35	\$233,722.35	NOT PAID
SP056004MH657	4/28/2005	belt, v cogged or notched (50)	\$249.50	\$90,569.50	NOT PAID
SP054005MK058	10/5/2005	washer, flat (5)	\$6.45	\$286,426.45	PAID
SP054005ML662	10/5/2005	screw, machine (2)	\$3.78	\$239,479.78	NOT PAID
SP056005M4558	11/18/2005	o-ring (20)	\$71.80	\$300,013.80	PAID
SP056005M4558	11/18/2005	o-ring (6)	\$21.54	\$299,962.54	PAID
SP056005M4558	11/18/2005	o-ring (12)	\$43.08	\$299,986.08	PAID
SP056005M4917	11/18/2005	o-ring (5)	\$22.50	\$399,401.50	PAID
SP054005M0272	3/22/2006	bolt, shoulder (80)	\$76.00	\$399,767.00	NOT PAID
SPM4A606M3661	4/6/2006	insulator (1)	\$9.99	\$40,725.99	NOT PAID
SP054005MH027	4/21/2006	pin, cotter (10)	\$19.90	\$499,568.90	PAID
SPM56005M2840	6/22/2006	retainer, helical (1)	\$27.29	\$599,974.29	NOT PAID
SP054004MS109	6/23/2006	screw, machine (6)	\$59.94	\$403,436.94	PAID
SP056006M6589	9/12/2006	washer, lock (2)	\$0.38	\$998,798.38	PAID
SP056006M6589	9/12/2006	washer, lock (2)	\$0.38	\$968,949.38	NOT PAID

4. It was further a part of the scheme that the Defendants, CHARLENE CORLEY and C&D DISTRIBUTORS, LLC, and others, including Person A, engaged in a series of financial transactions, primarily consisting of movements of funds from bank accounts in order to obtain the proceeds from their unlawful activities and in order to conceal and disguise the source, ownership, and control of the proceeds of these unlawful activities.

5. Defendant CHARLENE CORLEY and Person A, an unindicted co-conspirator, used the proceeds of this scheme to buy themselves and others luxury homes, automobiles, boats, vacations, jewelry, and plastic surgery.

**COUNT 1**

**CONSPIRACY**

1. The United States Attorney realleges and incorporates by reference Paragraphs 1 - 5 of the Introduction of this Information.

2. Beginning at a time unknown to the , but from at least in or about November 1997 and continuing to the date of this Information, in the District of South Carolina, the Defendants, CHARLENE CORLEY, C&D DISTRIBUTORS, LLC, and Person A, an unindicted co-conspirator, did knowingly, willfully and intentionally combine, conspire, agree and have a tacit understanding with each other and with persons both known and unknown to the United States Attorney to violate Title 18, United States Code, Section 1343 (the wire fraud statute) by using and causing the use of interstate wire communications in furtherance and execution of a scheme and artifice to defraud the United States in order to obtain money and property by means of false and fraudulent pretenses, representations and promises;

**OVERT ACTS**

3. In order to advance the purposes of the conspiracy and to accomplish the objects thereof, the following overt acts and other acts were performed by members of the conspiracy in the District of South Carolina:

a. On or about September 23, 2003, Defendant CHARLENE CORLEY submitted a bid to the Defense Logistics Agency - Defense Supply Center in Richmond, Virginia, to provide 19 longitudinal girders for \$3.99 each.

b. On or about March 26, 2004, Defendant C&D DISTRIBUTORS, LLC submitted a shipping invoice on Contract No. SP0414-03-M-AD63 for \$402,074.81 for fraudulent shipping costs through an electronic system via the internet. The payment was not issued.

c. On or about September 29, 2003, Defendant CHARLENE CORLEY sent a facsimile quotation to the Defense Logistics Agency in the Defense Logistics Supply Center to supply 3 automatic switches at a unit price of \$89.89 to be shipped within 30 days for a total contract price of \$269.67.

d. On or about April 2, 2004, Defendant C&D DISTRIBUTORS, LLC, submitted a shipping invoice on Contract No. SPM-760-04P-0852 in the amount of \$40,300.90 for fraudulent shipping costs through an electronic system via the internet. The payment was not issued.

e. On or about April 7, 2004, Defendant C & D DISTRIBUTORS, LLC, submitted a second shipping invoice on Contract No. SPM-760-04P-0852 in the amount of \$402,380.67 for fraudulent shipping costs through an electronic system via the internet. The payment was not issued.

f. On or about November 3, 2003, Defendant CHARLENE CORLEY gave a telephone quotation to an employee of the Defense Logistics Agency in the Defense Logistics Supply Center in Columbus, Ohio, for eleven (11) "pump units, centrifug" at a unit price of \$84.00 to be shipped within 15 days.



g. On or about November 7, 2003, Defendant C&D DISTRIBUTORS, LLC submitted a shipping invoice on Contract No. SP-07400-04-MR049 for \$41,076.00 for fraudulent shipping costs through an electronic system via the internet. The payment was not issued.

h. On or about November 11, 2003, Defendant C&D DISTRIBUTORS, LLC submitted a second shipping invoice on Contract No. SP-0700-04-MR049 for \$41,923.00 for fraudulent shipping costs through an electronic system via the internet. The payment was issued by DFAS in Columbus, Ohio, and electronically routed directly to operating accounts held by C&D DISTRIBUTORS, LLC in Lexington, South Carolina.

i. On or about April 19, 2004, Defendant CHARLENE CORLEY communicated via telephone with an employee of the Defense Logistics Agency in the Defense Logistics Supply Center in Columbus, Ohio, regarding Contract No. SPE760-04-P-0577 and the shipment of one check valve at a unit price of \$51.99.

j. On or about May 6, 2004, Defendant C&D DISTRIBUTORS, LLC, submitted a shipping invoice on Contract No. SPE760-04-P-0577 in the amount of \$40,289.99 for fraudulent shipping costs through an electronic system via the internet. The payment was not issued.

k. On or about June 15, 2004, Defendant CHARLENE CORLEY submitted a bid for a machine thread plug to the Emergency Supplies Operations

Center, a division of the Defense Logistics Agency - Defense Supply Center in Richmond, Virginia.

l. On or about July 20, 2004, Defendant CHARLENE CORLEY communicated via facsimile with the Emergency Supplies Operations Center regarding the shipment of the machine thread plug.

m. On or about July 24, 2004, Defendant CHARLENE CORLEY confirmed via facsimile to the Emergency Supplies Center that the machine thread plug had been shipped and provided the shipping confirmation information.

n. On or about July 23, 2004, Defendant C&D DISTRIBUTORS, LLC submitted a shipping invoice on Contract No. SP-0411-04W-E358 for \$492,096.99 for fraudulent shipping costs through an electronic system via the internet. The payment was issued by DFAS in Columbus, Ohio, and electronically routed directly to operating accounts held by C&D DISTRIBUTORS, LLC in Lexington, South Carolina.

o. On or about June 30, 2004, Defendant CHARLENE CORLEY sent a facsimile quotation to the Defense Supply Center in Columbus, Ohio, for five (5) brake parts for \$21.99 each to be shipped within fifteen (15) days.

p. On or about September 30, 2004, Defendant CHARLENE CORLEY confirmed via facsimile to the Defense Supply Center in Columbus, Ohio, that the 5 brake parts had been shipped on July 29, 2004, and provided the shipping tracking information.

q. On or about October 20, 2004, Defendant C&D DISTRIBUTORS, LLC submitted a shipping invoice on Contract No. for \$159,000.95 for fraudulent shipping costs through an electronic system via the internet. The payment was issued by DFAS in Columbus, Ohio, and electronically routed directly to operating accounts held by C&D DISTRIBUTORS, LLC in Lexington, South Carolina.

r. On or about November 9, 2004, Defendant CHARLENE CORLEY confirmed by facsimile to the Defense Supply Center in Columbus, Ohio, that one (1) box of fluorescent lamps had been shipped on October 6, 2004, and delivered on October 11, 2004, and provided the shipping tracking information.

s. On or about April 5, 2005, Defendant C&D DISTRIBUTORS, LLC submitted a shipping invoice on Contract No. SP-0560-04-M-DN22 for \$233,722.35 for fraudulent shipping costs through an electronic system via the internet. The payment was not issued.

t. On or about January 24, 2006, Defendant CHARLENE CORLEY submitted a bid to the Defense Logistics Agency - Defense Supply Center in Richmond, Virginia to supply one (1) insulator for \$9.99.

u. On or about April 6, 2006, Defendant C&D DISTRIBUTORS, LLC submitted a shipping invoice on Contract No. SPM4A6-06-M-3661 for \$40,725.99 for fraudulent shipping costs through an electronic system via the internet. The payment was not issued.

v. On or about September 12, 2006, Defendant C&D DISTRIBUTORS, LLC submitted two shipping invoices, each regarding two \$0.19 lock washers, on Contract No. SP0560-06-M-6589: one invoice for \$968,949.38 and one invoice for \$998,798.38 for fraudulent shipping costs through an electronic system via the internet. A payment for \$998,798.38 was issued by DFAS in Columbus, Ohio, and electronically routed directly to operating accounts held by C&D DISTRIBUTORS, LLC in Lexington, South Carolina;

All in violation of Title 18, United States Code, Section 1349.

COUNT 2

MONEY LAUNDERING CONSPIRACY

THE UNITED STATES ATTORNEY FURTHER CHARGES:

1. The United States Attorney realleges and incorporates by reference the Introduction of this Information.

2. From in or about November 1997, and continuing up to and including the date of this Information, in the District of South Carolina, the Defendants, CHARLENE CORLEY, C&D DISTRIBUTORS, LLC, and Person A, an unindicted co-conspirator, did knowingly and willfully combine, conspire, confederate and agree together and have tacit understanding with each other and various other persons, both known and unknown to the United States Attorney, to knowingly and willfully:

(a) conduct and attempt to conduct financial transactions which in fact involved the proceeds of specified unlawful activity, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, and ownership of the proceeds of the specified unlawful activity, and that while conducting the financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) engage in and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000, which in fact involved the

proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE

1. SPECIFIED UNLAWFUL ACTIVITIES:

A. Upon conviction for a violation of Title 18, United States Code, Sections 1349 (Conspiracy), as charged in this Information, the Defendants, CHARLENE CORLEY and C&D DISTRIBUTORS, LLC, shall forfeit to the United States any property, real or personal, which constitutes or is derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violations and any property traceable to such property.

2. MONEY LAUNDERING:

A. Upon conviction for a violation of Title 18, United States Code, Sections 1956(h), as charged in this Information, the Defendants, CHARLENE CORLEY and C&D DISTRIBUTORS, LLC, shall forfeit to the United States any property, real or personal, involved in such offenses, or any property traceable to such property;

3. Pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), and 28 U.S.C. § 2461(c), the property which is subject to forfeiture upon conviction of the Defendants CHARLENE CORLEY and C&D DISTRIBUTORS, LLC, for the violations charged in this Information includes, but is not limited to, the following:

A. Cash Proceeds / Personal Money Judgment:

A sum of money equal to all proceeds the Defendants obtained directly or indirectly as the result of the offenses charged in this Information,

and equal to property involved in the money laundering offenses charged in this Information, or traceable to such property, that is, a minimum of \$20,576,925 in United States currency;

B. Real Property:

All right, title and interest of the Defendants, C&D DISTRIBUTORS, LLC, and CHARLENE S. CORLEY, in and to certain real property, together with all improvements thereon, and with all rights and easements appertaining, being more fully described as follows:

1. **2.91 Acres, 3 Tracts**

**Lexington County, South Carolina**

**Tax Map Numbers: 004200-04-12, 004200-04-013 and 004200-04-014**

**Titled in the name of: C&D DISTRIBUTORS, LLC**

All that certain piece, parcel or tract of land, with improvements thereon, situate, lying and being near the Town of Lexington, School District No. 1, State of South Carolina, comprising of three tracts containing a total of 2.91 acres on a plat prepared for C&D DISTRIBUTORS, LLC by Survey & Mapping Service of South Carolina, Inc., dated May 14, 2002 and recorded in the Office of the ROD for Lexington County in Plat Slide 673, at Page 10. For a more specific description of the metes and bounds of said property, reference is hereby made to the aforementioned plat which is incorporated and made a part hereof. Also for plat see Record Book 7324 page 227.

This being the same property conveyed to C&D DISTRIBUTORS, LLC by deed of Thomas C. Boozer dated July 1, 2002, recorded July 3, 2002 in the Office of Register of Deeds for Lexington County in Book 7324 at Page 222.



2. **Lots 41 and 42, Block B**  
**Lexington County, South Carolina**  
**Tax Map Number: 003018-02-043**  
**Titled in the name of: C&D DISTRIBUTORS, LLC**

All that certain piece, parcel, lot or tract of land, with improvements thereon, situate, lying and being in the County of Lexington, State of South Carolina, located approximately nine (9) miles North of the Town of Lexington and to the East by U.S. Highway No. 378 and being more particularly shown and delineated as Lot No. Forty-one (41) and Lot No. Forty-two (42), Block "B" on a plat recorded in the Office of the Clerk of Court for Lexington County in Plat Book 62-G, at Page 85.

This being the same property conveyed to C&D DISTRIBUTORS, LLC by deed of Johnny R. Raley and Joanne S. Raley dated June 19, 2001, recorded June 21, 2001 in the Office of the Register of Deeds for Lexington County in Book 6462 at Page 211.

3. **607 Jungle Road, Edisto Island, SC, 29438**  
**Colleton County, South Carolina**  
**Tax Map Number: 357-02-00-026**  
**Titled in the name of: C&D DISTRIBUTORS, LLC, A Partnership**

ALL that certain piece, parcel or lot of land, situate, lying being on Edisto Beach in the County of Colleton, State of South Carolina, and being known and designated as Lot D, Block 11, on a plat entitled "A CLOSING SURVEY OF 607 JUNGLE ROAD, SHOWN AS LOT D BLOCK 11 ON A PLAT AT BOOK 602 PAGE 2. LOCATED IN THE TOWN OF EDISTO BEACH, COLLETON COUNTY, S.C. TO BE CONVEYED TO REA BOLIN" dated July 26, 2002, and recorded in the Office of the Clerk of Court for Colleton County in Book 700, at Page 9, said plat being incorporated herein as part of this description; said lot being bounded now or formerly and measuring more or less as follows: On the Northeast by Lot C, Block 11, and measuring thereon Ninety-nine and Ninety-three Hundredths (99.93') feet; on the Southeast by Jungle Road 50'R/W and measuring thereon One Hundred (100') feet; on the Southwest by Lot E, Block 11, and measuring thereon One Hundred Six and Ninety five Hundredths (106.95') feet; and on the Northwest by Jungle Shores Drive 50'R/W and measuring thereon One Hundred Nineteenth Hundredths (100.19') feet.

This being the same property conveyed to C&D DISTRIBUTORS, LLC, A Partnership by deed of Rea M. Bolin dated September 23, 2004, recorded September 24, 2004 in the Office of the Clerk of Court for Colleton in Book 01077 at Page 00044.

4. **314 Jungle Road, Edisto Island, SC 29438**  
**Colleton County, South Carolina**  
**Tax Map Number: 356-15-00-062**  
**Titled in the name of: C&D DISTRIBUTORS, LLC**

All that certain piece, parcel or lot of land, situate, lying and being in Jungle Shores Subdivision, in the Town of Edisto Beach, County of Colleton, State of South Carolina, and being designated as Lot G, Block 6, of said Subdivision, as shown on that certain plat entitled, "A Closing Survey of 314 Jungle Road, Known as Lot G, Block 6, of the Town of Edisto, Located in Colleton County, S.C., to be Conveyed to Calvin Clifton, Leslie Young, Kimberly Rakes-Stephens and Barry Stephens," prepared by Robert Frank Surveying, RLS #4177, dated May 5, 2004, and recorded June 10, 2004, in Plat Book 721, at Page 9, in the Office of the Clerk of Court for Colleton County, South Carolina. Said plat measures and bounds as follows: Bounded on the Northeast by Lot F, Block 6, of said Subdivision, and measuring thereon One Hundred Twelve and sixteen hundredths (112.16) feet; bounded on the Southeast by edge of highland, in an irregular line, and measuring thereon Eighty-six and ninety-nine hundredths (86.99) feet; bounded on the Southwest by Lot H, Block 6, of said Subdivision, and measuring thereon One Hundred Eight and eighty-five hundredths (108.85) feet; and bounded on the Northwest by a Street presently known as Jungle Road, and measuring thereon Eighty-six and thirty hundredths (86.30) feet; be all of said measurements more or less. For a more specific description, reference may be had to the above-referenced plat.

This being the same property conveyed to C&D DISTRIBUTORS, LLC, LLC by deed of Barry A. Stephens, Kimberly Rakes-Stephens, MD, Leslie B. Young nka Leslie Young Clifton and Calvin D. Clifton dated May 12 and May 15, 2006, recorded May 19, 2006 in the Office of the Clerk of Court for Colleton County in Book 01366 at Page 00124.

5. **2410 Highway 174, Edisto Island, SC 29438**  
**Colleton County, South Carolina**  
**Tax Map Number: 025-00-00-038**  
**Titled in the name of: C&D DISTRIBUTORS, LLC**

All that certain piece, parcel or tract of land, with buildings and improvements thereon, situate, lying and being on Edisto Island in the County of Charleston, State of South Carolina, containing 1.3578 acres, more or less, of highland, and 2.7036 acres, more or less, of marsh, and being shown and designated as "LOT B-HIGHLAND" and "LOT B-MARSH" on a plat prepared by Robert L. Frank, RLS #4177, entitled "A BOUNDARY SURVEY, CUL DE SAC ABANDONMENT, AND DOCK EASEMENT ADJUSTMENT OF LOT B LOCATED ON EDISTO ISLAND CHARLESTON COUNTY, SOUTH CAROLINA" dated April 2, 2003, revised June 19, 2003, and recorded in the RMC Office for Charleston County in Plat Book EG at Page 457, said plat being incorporated herein as a part of this description and said tract being bounded now or formerly and measuring more or less as follows: On the Northeast by Store Creek and measuring thereon Three Hundred Seventy-nine and Eighteen Hundredths (379.18') feet; on the East and Northeast by marsh and by highland belonging to Steve R. and Helen P. Rowland and measuring thereon Four Hundred Sixty-five and Forty-two Hundredths (465.42') feet and Four Hundred Thirteen and Seventy-seven Hundredths (413.77') feet, respectively, on the Southeast by a 50' R/W Easement and measuring thereon One Hundred Thirty-four and Ninety-six Hundredths (134.96') feet; and on the Southwest by highland and my marsh belonging to Meredith Family, LLC, and measuring thereon Four Hundred Forty-four and Thirty-seven Hundredths (444.37') feet and Seven Hundred Thirty and Eighty-three Hundredths (730.83') feet, respectively.

This being the same property conveyed to C&D DISTRIBUTORS, LLC, LLC by deed of Newton Cooke Boykin dated August 21, 2006, recorded August 23, 2006 in the office of the Register of Deeds for Colleton County in Book R595 at Page 555.

6. **2701 Myrtle Street**  
**Edisto, South Carolina 29438**  
**Colleton County, South Carolina**  
**Tax Map Number: 354-12-00-095**  
**Titled in the name of: 2701 Myrtle Street, LLC**

All that certain piece, parcel or lot of land, with buildings and improvements thereon, situate, lying and being in the Town of Edisto Beach, County of Colleton, State of South Carolina, being known and designated as Lot 1, Block EEE, as shown on a plat entitled "PLAT & HOUSE LOCATION MADE AT THE REQUEST OF SUSAN SIMMS" prepared by Heaner Inc. dated June 30, 2006, and recorded in the RMC Office for Charleston County in Plat Book 762 at Page 10, said plat being incorporated herein as a part of this description and said lot being bounded now or formerly and measuring more or less as follows: On the Northeast by Laroche Street and measuring thereon One Hundred Fifty and Six Tenths (150.6') feet; on the Southeast by Myrtle Street and measuring thereon Seventy-four and Nine Tenths (74.9') feet; on the Southwest by Lot 2, Block EEE, and measuring thereon One Hundred Forty-nine and Eighty-eight Hundredths (149.88') feet; and on the Northwest by Lot 5, Block EEE, and measuring thereon Seventy-four and Ninety-nine Hundredths (74.99') feet.

This being the same property conveyed to 2701 Myrtle Street, LLC by deed of Susan B. Sims dated September 29, 2006, recorded October 4, 2006 in the office of the Register of Deeds for Colleton County in Book 1422 at Page 31.

C. Bank Accounts/Investment Accounts:

Funds, interest and credits in banking, brokerage and investment accounts held for any of the Defendants, C&D DISTRIBUTORS, LLC, and CHARLENE S. CORLEY, at financial institutions, which includes, but is not limited to the following:

1. First Community Bank, Lexington, South Carolina  
 Account #1039881  
 In the name of: C&D DISTRIBUTORS, LLC  
 Approximate Balance: \$2,671,817.28

2. First Community Bank, Lexington, South Carolina  
Account #2099926  
In the name of: Darlene Wooten  
Approximate Balance: \$6,230.82
3. First Community Bank, Lexington, South Carolina  
Account #2148633  
In the name of: Darlene Wooten  
Approximate Balance: \$2,317.07
4. First Community Bank, Lexington, South Carolina  
Account #2148706  
In the name of: Darlene Wooten  
Approximate Balance: \$9,716.83
5. First Community Bank, Lexington, South Carolina  
Account #2099888  
In the name of: Charlene Corley  
Approximate Balance: \$5,658.79
6. First Community Bank, Lexington, South Carolina  
Account #2148803  
In the name of: Charlene Corley  
Approximate Balance: \$4,402.69

D. Vehicles/Boats:

1. 2007 Mercedes Benz SL550R, white in color  
VIN# WDBSK71F07F124726  
Registered to: C&D DISTRIBUTORS, LLC LLC  
SC License Tag: 537TTH
2. 2007 Mercedes Benz SL550R, silver in color  
VIN# WDBSK71F67F119028  
Registered to: C&D DISTRIBUTORS, LLC  
SC License Tag: 607UBW
3. 2007 Mercedes Benz S550V  
VIN# WDDNG71XX7A070900  
Registered to: C&D DISTRIBUTORS, LLC LLC  
SC License Tag: 536TTH

4. 2007 BMW 550I, black in color  
VIN# WBANB53577CP04982  
Registered to: C&D DISTRIBUTORS, LLC  
SC License Tag: 608UBW
5. 2006 Lexus LS430  
VIN# JTHBN36F365038467  
Registered to: C&D DISTRIBUTORS, LLC  
SC License Tag: T13483
6. 2005 Lexus SC 430  
VIN# JTHFN48Y150066530  
Registered to: C&D DISTRIBUTORS, LLC  
SC License Tag: 536TTH
7. Mercedes SL550  
VIN#WDBSK71F27F123271  
Registered to: Ellery Locklear  
SC License Tag: 302VUB
8. 2005 Lexus RX  
VIN# 2T2GA31U95C029813  
Registered to: C&D DISTRIBUTORS, LLC  
SC License Tag: 608UBW
9. 2006 Lexus LX  
VIN# JTJHT00W764009825  
Registered to: C&D DISTRIBUTORS, LLC  
SC License Tag: 537TTH
10. 2006 Lexus SC  
VIN# JTHFN48Y369004530  
Registered to: C&D DISTRIBUTORS, LLC  
SC License Tag: 536TTH
11. 1999 Kawasaki 10' inboard watercraft  
Registration number 2815BL5
12. 2001 Suntracker 23' outboard watercraft  
Registration number 9624BK

E. Businesses/Corporate Interests:

Any and all right title and interest of C&D DISTRIBUTORS, LLC, and CHARLENE CORLEY, in and to business assets and corporate interests held in the name(s) of the following entities, including but not limited to, all monies, claims, interests and accounts receivable payable to or received by the following entities:

1. C&D Delivery Services  
130 Wing Hill Drive  
Lexington, South Carolina 29072
2. Dough and Cookie, LLC  
1773 Augusta Road  
Lexington, South Carolina 29072
3. Foreign Commodities International, Inc.  
130 Wing Hill Drive  
Lexington, South Carolina 29072
4. Industrial Building Materials Corporation  
Address Unknown
5. United Technical Systems, LLC  
Address Unknown

F. Fixtures, equipment and inventory located at the following businesses:

1. C&D Delivery Services  
130 Wing Hill Drive  
Lexington, South Carolina 29072
2. Dough and Cookie, LLC  
1773 Augusta Road  
Lexington, South Carolina 29072
3. Foreign Commodities International, Inc.  
130 Wing Hill Drive  
Lexington, South Carolina 29072

4. Industrial Building Materials Corporation  
Address Unknown
5. United Technical Systems, LLC  
Address Unknown

4. **SUBSTITUTE ASSETS:**

A. If any of the property described above as being subject to forfeiture to the United States, as a result of any act or omission of the Defendants C&D DISTRIBUTORS, LLC, and CHARLENE CORLEY:

- (1) Cannot be located upon the exercise of due diligence;
- (2) Has been transferred or sold to, or deposited with a third party;
- (3) Has been placed beyond the jurisdiction of the Court;
- (4) Has been substantially diminished in value; or
- (5) Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 982(b)(1), [incorporating Title 21, United States Code, Section 853(p)], to seek forfeiture of any other property of the said Defendants up to the value of the above forfeitable property, including but not limited to the following property:

B. **Real Property:**

All right, title and interest of the Defendant, CHARLENE S. CORLEY, in and to certain real property, together with all improvements thereon, and with all rights and easements appertaining, being more fully described as follows:



1. **886 Corley Mill Road, Lexington, South Carolina**  
**Lexington County, South Carolina**  
**Tax Map Number: 003500-01-033**  
**Titled in the name of: Charlene Shuler Corley**

AN UNDIVIDED ONE-HALF INTEREST IN AND TO: all that certain piece, parcel or lot of land, together with the improvements thereon, situate, lying and being bounded on the Northwest and Northeast by other land n/f of Annie Bell Corley, on the Southeast by lands formerly of Bowden and later of Gantt, and on the Southwest by the public road from Columbia to Lake Murray; all of which will be more particularly shown by a plat thereof made by Jas. C. Covington, C.E., May 13, 1959, recorded in Plat Book 50-G, at page 160. Said plat shown this property containing 4.1 acres, more or less. For a more complete description, reference is had to said plat.

This property being the same undivided one-half interest conveyed to Charlene Shuler Corley by Deed of Wayne Drafts Corley, dated September 4, 2002 and recorded September 11, 2002 in the Office of the ROD for Lexington County in Record Book 7480 at Page 340.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1) and Title 28, United States Code, Section 2461(c) .

s/Reginald I. Lloyd  
REGINALD I. LLOYD (DBB & WDH, Jr.)  
UNITED STATES ATTORNEY